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04:45:06 1 The re line is:

04:45:07 2 "PR for escrow."

04:45:13 3 This is an exchange with you and the [REDACTED]
04:45:16 4 folks. My questions are about your email, so let me
04:45:20 5 know when you're ready.

04:46:35 6 A. Okay.

04:46:57 7 Q. All right. So you write to the [REDACTED]
04:47:01 8 folks:

04:47:02 9 "For us to discuss on Monday.

04:47:03 10 See Asheesh's note below. My
04:47:05 11 initial thoughts and would
04:47:07 12 appreciate your input."

04:47:07 13 The first bullet is:

04:47:08 14 "Objective is to create a
04:47:10 15 second wave of excitement about the
04:47:13 16 lockup, first wave being the
04:47:14 17 announcement we would do it, among
04:47:16 18 speculators."

04:47:17 19 Is "the lockup" the escrow of a portion of
04:47:20 20 Ripple's XRP holdings?

04:47:22 21 A. Yes.

04:47:25 22 Q. Okay. And the objective is to create a
04:47:27 23 second wave of excitement among speculators.

04:47:31 24 What does a wave of excitement look like
04:47:33 25 among speculators?

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04:47:35 1 A. I don't know.

04:47:37 2 Q. But you're trying to create that

04:47:38 3 objective, right?

04:47:39 4 A. Yes. I see here the objective as you

04:47:42 5 stated it.

04:47:44 6 Q. Well, as you stated it.

04:47:46 7 A. Yes. I see my email.

04:47:48 8 Q. But sitting here today, you don't know

04:47:52 9 what a "second wave of excitement" means here?

04:47:56 10 A. I don't recall this at all, no.

04:47:57 11 Q. Do you recall what the first wave of

04:47:58 12 excitement was?

04:47:59 13 A. No. I see it here in the email.

04:48:02 14 Q. The reference to "speculators," do you

04:48:04 15 understand that to be speculators in XRP?

04:48:09 16 A. I understand that to be speculators in

04:48:13 17 XRP.

04:48:14 18 Q. Okay. So is it a logical reading of this

04:48:17 19 that "excitement" and "speculators in XRP" means

04:48:22 20 purchases of XRP?

04:48:25 21 A. I don't know. I couldn't -- I don't know.

04:48:32 22 Q. Do you recall any communications with

04:48:35 23 anyone at Ripple regarding the first wave of

04:48:39 24 excitement among speculators with respect to the

04:48:42 25 announcement of the lockup?

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04:48:44 1 A. I don't.

04:48:46 2 Q. Was it your objective in the marketing

04:48:48 3 team to create excitement among speculators in

04:48:53 4 connection with the announcement of the lockup?

04:48:55 5 A. I don't recall that.

04:48:58 6 Q. You don't know one way or the other?

04:49:01 7 A. I don't.

04:49:03 8 Q. Did you have any role in public messaging

04:49:06 9 regarding the escrow at all?

04:49:08 10 A. Yes.

04:49:09 11 Q. And what -- what was the -- strike that.

04:49:13 12 What was your role?

04:49:15 13 A. I recall -- I recall a blog post. My -- I

04:49:23 14 believe my role was I reviewed it, maybe made some

04:49:29 15 edits to it, and then my team published it.

04:49:35 16 Q. Did you undertake any other marketing

04:49:37 17 efforts with respect to the announcement of the

04:49:39 18 escrow?

04:49:40 19 A. Not that I recall, no.

04:49:44 20 Q. As part of your PR responsibilities, were

04:49:47 21 you involved in public statements made by Ripple

04:49:50 22 that XRP was not a security?

04:49:54 23 MR. CERESNEY: Objection. Time frame?

04:49:58 24 BY MR. SYLVESTER:

04:49:58 25 Q. At any time were you ever involved in any

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04:50:01 1 of Ripple's public statements that XRP is not a
04:50:03 2 security?

04:50:04 3 A. Yes.

04:50:06 4 Q. When -- when was -- when did that
04:50:08 5 involvement start?

04:50:13 6 A. I couldn't say specifically. I generally
04:50:16 7 remember the 2018 time frame.

04:50:19 8 Q. Okay. Was there a precipitating event
04:50:23 9 that made that the focus of your marketing efforts
04:50:26 10 in approximately 2018?

04:50:29 11 MR. CERESNEY: Objection. Focus of
04:50:30 12 marketing efforts, that's not what she said.

04:50:39 13 Do you want her to answer the question?

04:50:43 14 MR. SYLVESTER: Sure.

04:50:43 15 THE WITNESS: I recall --

04:50:43 16 MR. CERESNEY: Hold on.

04:50:43 17 Initially you asked -- the reason I'm
04:50:44 18 objecting is initially you asked, "Were you involved
04:50:46 19 in public statements made my Ripple that XRP as not
04:50:50 20 a security?"

04:50:50 21 "Yes. Couldn't say specifically 2018 time
04:50:52 22 frame."

04:50:52 23 And then you transformed that into "a
04:50:55 24 focus of your marketing efforts in approximately
04:50:57 25 2018."

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04:50:57 1 MR. SYLVESTER: Even worse, I said "the
04:50:59 2 focus," so let's try this.

04:51:01 3 MR. CERESNEY: Right. So let's try again.

04:51:02 4 BY MR. SYLVESTER:

04:51:02 5 Q. Was there a precipitating event that made
04:51:04 6 a focus of your messages regarding XRP not being a
04:51:09 7 security?

04:51:09 8 MR. CERESNEY: I'm going to object again.
04:51:11 9 She hasn't said it was a focus of their marketing
04:51:14 10 efforts.

04:51:15 11 But you can answer if you can.

04:51:18 12 THE WITNESS: We -- we did -- we began to
04:51:22 13 get press inquiries. I recall a Bloomberg story
04:51:29 14 that discussed that as an issue. And I recall a
04:51:34 15 class action lawsuit that was filed, became public,
04:51:38 16 and then we were getting a bunch of press inquiries
04:51:42 17 about it that we responded to.

04:51:43 18 BY MR. SYLVESTER:

04:51:43 19 Q. Is that the Coffey case?

04:51:45 20 A. Yes.

04:51:47 21 Q. Okay. And -- okay.

04:51:54 22 Did you monitor news media regarding
04:51:58 23 statements in the press regarding XRP's status as a
04:52:01 24 security?

04:52:03 25 A. Yes.

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04:52:04 1 Q. What media did you monitor?

04:52:08 2 A. Press and social media.

04:52:11 3 Q. Okay. And how did you go about doing
04:52:13 4 that?

04:52:14 5 A. Our PR agencies would, just using Google
04:52:20 6 News, identify -- and search terms, identify the
04:52:23 7 stories and similar. Just using search terms or the
04:52:28 8 tools I mentioned earlier, like [REDACTED] identify
04:52:32 9 social media posts about it.

04:52:33 10 Q. Did you ask them to do that?

04:52:36 11 A. I -- well, they were monitoring for
04:52:41 12 mentions of Ripple generally and XRP generally, so
04:52:45 13 that's how I believe they came up, not specific to
04:52:49 14 securities.

04:52:52 15 Q. Okay. Is there any other way that you
04:52:54 16 kept yourself informed as to what people were saying
04:52:57 17 regarding XRP status as a security?

04:53:02 18 A. Those would -- would have been the main
04:53:05 19 mechanisms for, yeah, monitoring public statements.

04:53:09 20 Q. Okay. And the PR agencies reported up
04:53:13 21 their monitoring results to you; is that right?

04:53:16 22 A. Yes.

04:53:16 23 Q. Did you report those results to anyone
04:53:18 24 else?

04:53:19 25 A. Yes. The -- the news sweeps, is what I

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04:53:23 1 would call them, were distributed to the leadership

04:53:27 2 team -- sorry, the leadership team is

04:53:31 3 Brad Garlinghouse's staff of direct reports, and

04:53:33 4 also other leaders at the company, which was just

04:53:36 5 standard course. Every daily news scan went to that

04:53:41 6 whole distribution.

04:53:42 7 Q. Okay. And when did Ripple start making --

04:53:49 8 strike that.

04:53:53 9 When you started to receive these press

04:53:56 10 inquiries about XRP's status as a security, was that

04:54:01 11 a cause for concern for anyone at Ripple?

04:54:05 12 MR. CERESNEY: Objection. Form.

04:54:15 13 THE WITNESS: Can you clarify what that

04:54:16 14 means, "cause for concern"?

04:54:19 15 BY MR. SYLVESTER:

04:54:19 16 Q. Were people at Ripple worried?

04:54:25 17 A. About the press inquiries?

04:54:27 18 Q. Were people at Ripple worried more

04:54:29 19 generally -- more generally about the topic of

04:54:32 20 whether or not XRP was a security?

04:54:35 21 MR. CERESNEY: Just one note of caution

04:54:37 22 here. We may be treading into areas where counsel

04:54:42 23 was involved in discussions, so I would just

04:54:45 24 instruct the witness not to go into any discussions

04:54:47 25 that she may have had with counsel.

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04:54:49 1 Obviously, if counsel is not involved,
04:54:51 2 it's not privileged. You can answer the question.

04:54:57 3 THE WITNESS: We certainly -- well,
04:55:01 4 backing up, from the -- almost the beginning, I want
04:55:05 5 to say 2014, it was a part of our practice to seek
04:55:12 6 to proactively educate regulators around the world
04:55:16 7 about blockchain technology, about cryptocurrencies,
04:55:18 8 so how to think about the assets was one part of
04:55:24 9 that. But it was a broader -- it was a broader
04:55:30 10 initiative we had. And that was -- that was pretty
04:55:33 11 much from the beginning.

04:55:35 12 So in the case of these inquiries we were
04:55:37 13 receiving about XRP and questions about whether it
04:55:44 14 would be categorized as a security, we -- we did
04:55:48 15 want to get our point of view out there. So that's
04:55:52 16 why we responded.

04:55:56 17 BY MR. SYLVESTER:

04:55:56 18 Q. Responded to the press, you mean?

04:55:58 19 A. Responded to the press, yes.

04:56:00 20 Q. Okay. The -- the activities that you
04:56:02 21 described in terms of educating regulators starting
04:56:06 22 in 2014, were you involved at all in that?

04:56:10 23 A. I -- I -- yes.

04:56:13 24 Q. In what way?

04:56:14 25 A. I contributed with messaging and decks,

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04:56:19 1 you know, what our policy or regulatory relations
04:56:23 2 teams would need.

04:56:27 3 Q. Okay. Did those decks that you created
04:56:30 4 address the issue of whether or not XRP was a
04:56:32 5 security?

04:56:33 6 A. Not that I recall.

04:56:35 7 Q. Did the initiatives that you describe
04:56:37 8 include contacting the SEC?

04:56:39 9 A. Not to my knowledge.

04:56:40 10 Q. Why not?

04:56:43 11 A. To my knowledge?

04:56:44 12 MR. CERESNEY: Yeah. To your -- as long
04:56:46 13 as it doesn't involve discussions with counsel, you
04:56:48 14 can go ahead and answer.

04:56:49 15 THE WITNESS: Well, I just wouldn't know.

04:56:51 16 That wasn't my -- I was on the kind of marketing
04:56:55 17 communications side, providing kind of general
04:56:58 18 documents about, you know -- about the company, that
04:57:00 19 kind of thing. The regulatory teams, the legal team
04:57:05 20 is who actually went and interfaced with regulators.

04:57:09 21 BY MR. SYLVESTER:

04:57:09 22 Q. Right.

04:57:09 23 And I think -- correct me if I'm wrong --
04:57:11 24 you're saying you don't know one way or the other
04:57:14 25 whether or not they talked to the SEC?

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04:57:15 1 A. Yes. I don't know one way or the other.

04:57:17 2 Q. Okay. I misunderstood you in the first
04:57:18 3 place.

04:57:22 4 So, again, not invading any conversations
04:57:25 5 with counsel, did you have any conversations with
04:57:27 6 anyone at Ripple, starting in the, say, 2018 time
04:57:31 7 frame, about whether or not XRP was a security?

04:57:37 8 A. I -- that would be under privilege. I
04:57:40 9 have had discussions with the legal team, but ...

04:57:46 10 Q. What about with Mr. Garlinghouse outside
04:57:49 11 of the presence of lawyers?

04:57:57 12 MR. SOLOMON: I'm going to ask you to be
04:57:59 13 careful there because that could still be privileged
04:58:01 14 also depending on the nature of the information that
04:58:06 15 Mr. Garlinghouse may have conveyed. The source of
04:58:09 16 the information Mr. Garlinghouse may have conveyed
04:58:11 17 could have been from lawyers.

04:58:13 18 MR. SYLVESTER: I think the question is
04:58:14 19 probably okay.

04:58:15 20 MR. CERESNEY: Yeah. The question is just
04:58:16 21 a "yes" or "no" answer. You can answer "yes" or
04:58:19 22 "no" or "I don't recall." The question is did you
04:58:22 23 have discussions with Mr. Garlinghouse on that
04:58:24 24 topic?

04:58:28 25 THE WITNESS: To my recollection, only,

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04:58:32 1 you know, reviewing talking points. So if he's

04:58:35 2 going to respond to, you know, a press inquiry, just

04:58:40 3 preparing for that interview.

04:58:42 4 BY MR. SYLVESTER:

04:58:42 5 Q. Okay.

04:58:42 6 A. That's my recollection.

04:58:43 7 Q. Okay. So there were occasions that

04:58:46 8 Mr. Garlinghouse was going to have an interview

04:58:49 9 and --

04:58:50 10 A. That we -- I knew, yeah, from preparation,

04:58:52 11 that that question would -- might come up, and so

04:58:55 12 just reviewing talking points.

04:58:57 13 Q. Okay. Did you prepare the talking points?

04:59:00 14 A. The talking points were prepared by

04:59:02 15 counsel.

04:59:04 16 Q. Okay. What was your role in reviewing

04:59:11 17 them with him?

04:59:14 18 A. You know, for any press interview, I would

04:59:18 19 just go over, you know, what report are you speaking

04:59:21 20 to and, you know, maybe do a test run of different

04:59:28 21 questions. Very typical for any press preparation.

04:59:40 22 Q. Do you recall -- again, in the 2018 time

04:59:45 23 frame and separate from any conversations with

04:59:47 24 counsel -- anyone at Ripple expressing concerning

04:59:49 25 that XRP might be a security?

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04:59:51 1 A. I don't recall that.

04:59:53 2 Q. Just to clarify your testimony, you don't
04:59:55 3 know one way or the other, or, no, that didn't
04:59:58 4 happen?

04:59:58 5 A. I -- I don't know one way or the other.

05:00:01 6 Q. Okay. Did Ripple ever make any public
05:00:13 7 statements to the effect that XRP was a currency?

05:00:19 8 A. To my recollection, yes.

05:00:21 9 Q. When was that?

05:00:27 10 A. I -- I have a vague recollection of
05:00:30 11 various documents, blog posts, tweets, various
05:00:33 12 forums where we would talk about XRP as a bridge
05:00:36 13 asset or bridge currency. So we would talk about it
05:00:39 14 as a type of currency.

05:00:41 15 Q. Okay.

05:00:42 16 A. I also recall -- apologies -- there was
05:00:45 17 a -- a dealing with FinCEN coming out of that. They
05:00:51 18 referred to XRP as a virtual currency, so I remember
05:00:54 19 that as a moment of, Oh, this is how the U.S. thinks
05:01:01 20 about XRP.

05:01:02 21 Q. When you received the inquiries from the
05:01:04 22 press on the topic of XRP's status as a security,
05:01:09 23 did you ever direct them to the FinCEN settlement?

05:01:12 24 A. I believe that that was -- yes.

05:01:23 25 Q. Who set the strategy for Ripple's

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05:01:25 1 communications regarding whether XRP was a security?

05:01:27 2 A. Our legal team.

05:01:36 3 Q. Okay. Going back to the efforts to

05:01:39 4 monitor press about XRP being a security, you

05:01:46 5 mentioned, I think, news compilations prepared by

05:01:49 6 the PR agencies; is that right?

05:01:51 7 A. Yes.

05:01:53 8 Q. Setting aside that -- that -- the news

05:01:57 9 compilations, were there other occasions in which

05:01:59 10 you conveyed information gained by the marketing

05:02:03 11 team regarding what was being said in the media

05:02:06 12 about whether or not XRP was a security?

05:02:11 13 A. Not -- not to my recollection. There may

05:02:15 14 have been individual emails from our PR agencies

05:02:21 15 flagging stories, but, yeah, that's, I think, mainly

05:02:25 16 where we would have learned.

05:02:27 17 Q. Okay. Did you convey -- strike that.

05:02:46 18 MR. SYLVESTER: Let's look at Exhibit 54.

05:02:47 19 (Whereupon, Deposition Exhibit 54

05:02:49 20 was marked for identification.)

05:02:49 21 BY MR. SYLVESTER:

05:03:07 22 Q. So Exhibit 54 is an email from you to

05:03:10 23 [REDACTED] at [REDACTED] cc to people at [REDACTED]

05:03:14 24 [REDACTED] It's August 24, '17.

05:03:18 25 "Re a few clarifications on

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05:03:20 1 your Ripple story."

05:03:25 2 This is a thread on top of what appears to

05:03:28 3 be a communication between [REDACTED] and a

05:03:31 4 reporter; is that right?

05:03:32 5 A. Yes.

05:03:35 6 Q. Okay. It looks like [REDACTED] reached

05:03:44 7 out to the reporter to clarify a few things in his

05:03:47 8 Ripple piece; is that right?

05:03:48 9 A. That's -- yes, I see that.

05:03:50 10 Q. Okay. Who is [REDACTED]?

05:03:56 11 A. A reporter.

05:03:58 12 Q. And is [REDACTED] one of the reporters

05:04:01 13 that Ripple has a relationship with?

05:04:03 14 A. Yes.

05:04:05 15 Q. Would you say [REDACTED] has a good

05:04:09 16 understanding of Ripple's business?

05:04:13 17 A. I couldn't say.

05:04:14 18 Q. Because you don't know?

05:04:15 19 A. Because I don't know.

05:04:16 20 Q. Okay. Turning to the first page, which is

05:04:23 21 your email, a few questions.

05:04:29 22 The third paragraph down says:

05:04:31 23 "If Brad is saying banks are

05:04:33 24 using XRP, that's a problem. We

05:04:35 25 need to manage him on that."

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05:04:38 1 A. Sorry. I want to read -- I want to read
05:04:40 2 the thread.

05:04:41 3 Q. Oh, sure. Go ahead.

05:07:23 4 A. Okay.

05:07:24 5 Q. Okay. Great.

05:07:25 6 So the question was if banks are -- if
05:07:28 7 Brad is saying banks are using XRP, that's a
05:07:32 8 problem."

05:07:33 9 Why would that be a problem?

05:07:37 10 A. I don't recall from this time.

05:07:40 11 Q. Were banks using XRP in August 2017?

05:07:44 12 A. That's -- I don't recall.

05:07:45 13 Q. So the problem is that statement might be
05:07:48 14 false?

05:07:50 15 MR. CERESNEY: Objection. Form.

05:07:55 16 THE WITNESS: Yeah, I wouldn't -- sorry.
05:07:58 17 I would not -- I would not categorize it that way.
05:08:01 18 I'm just not sure why I said that.

05:08:06 19 BY MR. SYLVESTER:

05:08:06 20 Q. Okay. The paragraph right under that:

05:08:10 21 "On the confusion between XRP
05:08:12 22 and Ripple, it is a problem we need
05:08:14 23 to course correct overall with
05:08:16 24 media. By subbing in Ripple for
05:08:19 25 XRP, what's printed perpetuates

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05:08:21 1 market confusion about our products

05:08:22 2 and in some cases puts our company

05:08:24 3 at risk."

05:08:25 4 What is the risk that that confusion might

05:08:28 5 put Ripple in?

05:08:40 6 A. I'm not sure in this case -- I'm not sure

05:08:43 7 if it would reveal privileged information.

05:08:48 8 Q. Okay. Let's move on to the next sentence.

05:09:20 9 "Given the sensitive

05:09:21 10 relationship here, I'm going to let

05:09:23 11 it go."

05:09:24 12 The "sensitive relationship" is the

05:09:25 13 relationship between Ripple and [REDACTED]

05:09:34 14 A. I'm not sure. That may be the case. I'm

05:09:41 15 not sure.

05:09:42 16 Q. Okay. Confusion between XRP and Ripple

05:09:48 17 was a concern of yours; is that right?

05:09:54 18 A. Yes.

05:09:57 19 Q. Okay. And you say here that:

05:09:59 20 "What's printed in this

05:10:02 21 article perpetuates market

05:10:05 22 confusion and in some cases puts

05:10:07 23 our company at risk."

05:10:08 24 In light of that, why were you okay with

05:10:10 25 letting it stand as it was?

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05:10:12 1 A. I'm not sure. I can't remember.

05:10:18 2 MR. SYLVESTER: Okay. I think we're at

05:10:19 3 about an hour left, so let's take a quick break and

05:10:22 4 then do the last hour.

05:10:23 5 MR. CERESNEY: Okay.

05:10:24 6 THE WITNESS: Okay.

05:10:24 7 MR. SYLVESTER: Let's go off the record.

05:10:26 8 THE VIDEOGRAPHER: This marks the end of

05:10:27 9 Media Number 8. Sorry. Our time now is 5:10 p.m.,

05:10:32 10 and we're going off record.

05:16:30 11 (Whereupon, a recess was taken.)

05:25:41 12 THE VIDEOGRAPHER: This marks the

05:25:42 13 beginning of Media 9. Our time now is 5:25 p.m.,

05:25:47 14 and we're on the record.

05:25:49 15 MR. SYLVESTER: Okay. Let's start with

05:25:50 16 Exhibit 82, please.

05:25:52 17 (Whereupon, Deposition Exhibit 82

05:25:52 18 was marked for identification.)

05:25:53 19 BY MR. SYLVESTER:

05:26:04 20 Q. Exhibit 82 is --

05:26:09 21 PHONE PARTICIPANT: What did you say? I

05:26:11 22 didn't hear.

05:26:13 23 MR. SYLVESTER: 82, please.

05:26:15 24 PHONE PARTICIPANT: 82?

05:26:17 25 MR. SYLVESTER: Yes, please.

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05:26:18 1 Q. Exhibit 82 is an email from [REDACTED] to

05:26:24 2 you, among others, dated December 21st, 2017. And

05:26:31 3 there's a thread of emails and an attachment.

05:26:42 4 And I won't ask you questions about every

05:26:43 5 single page, but I do have questions about the

05:26:47 6 attachment as well.

05:26:48 7 A. Okay.

05:26:48 8 Okay.

05:31:09 9 Q. Okay. Let's start by taking a look at

05:31:11 10 your email, December 20, 2:20 p.m.

05:31:15 11 A. Yes.

05:31:17 12 Q. You say:

05:31:19 13 "We need to be super careful

05:31:20 14 about how we talk about XRP. We

05:31:22 15 cannot refer to it as an

05:31:23 16 investment, it's not, or buyers as

05:31:26 17 investors."

05:31:27 18 Why is that true?

05:31:32 19 MR. CERESNEY: Just one note of caution on

05:31:34 20 this is -- in terms of you shouldn't reveal any

05:31:38 21 discussions with counsel, so -- but you can answer

05:31:40 22 the question otherwise.

05:31:49 23 THE WITNESS: I'm sorry. Can you repeat

05:31:50 24 the question one more time.

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05:31:51 1 BY MR. SYLVESTER:

05:31:52 2 Q. Sure.

05:31:52 3 Why is it that Ripple needed to be super
05:31:55 4 careful how it talked about XRP and not refer to it
05:31:58 5 as an investment?

05:32:03 6 A. Well, the half of it is the -- I mean, it
05:32:09 7 says it's not. So our view was that XRP is not an
05:32:16 8 investment, so it was a matter of accuracy of
05:32:20 9 communication.

05:32:22 10 Otherwise, to go further, it would be
05:32:25 11 revealing privileged conversations with lawyers.

05:32:33 12 Q. So just to make sure I understand your
05:32:35 13 answer, any other reason why Ripple needed to be
05:32:42 14 super careful about how it talked about XRP would
05:32:44 15 reveal communications with your counsel?

05:32:50 16 A. I believe so.

05:32:54 17 Q. This email is to [REDACTED]
05:32:59 18 correct?

05:32:59 19 A. Yes.

05:33:00 20 Q. Did anyone at [REDACTED] ever ask you anything
05:33:05 21 about how [REDACTED] was permitted or not permitted to
05:33:10 22 talk about XRP?

05:33:15 23 A. Not to my recollection.

05:33:17 24 Q. Did anyone at [REDACTED] ask you why it was
05:33:22 25 impermissible to refer to XRP as an investment?

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05:33:28 1 A. Not to my recollection.

05:33:36 2 Q. Okay. [REDACTED] writes an email that

05:33:38 3 says -- this is the first page:

05:33:40 4 "Definitely important to

05:33:40 5 adhere to our speaking points in

05:33:42 6 XRP."

05:33:43 7 Who is [REDACTED]?

05:33:45 8 A. General counsel. Or she was the general

05:33:46 9 counsel at the time.

05:33:47 10 Q. Okay. And then she -- on the top email,

05:33:54 11 says:

05:33:55 12 "Hi, [REDACTED] Attaching our

05:33:57 13 internal draft message re how to

05:33:59 14 talk XRP."

05:34:00 15 And then attaches the attachment, which is

05:34:09 16 labeled, "Subject - How we talk about XRP - (from

05:34:11 17 your legal department.)"

05:34:13 18 Do you see that?

05:34:13 19 A. Yes.

05:34:17 20 Q. Have you seen this document prior to

05:34:18 21 today?

05:34:20 22 MR. CERESNEY: Other than -- you mean

05:34:21 23 other than in preparation for this --

05:34:23 24 THE WITNESS: Yes.

05:34:25 25 MR. CERESNEY: Yeah.

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05:34:26 1 THE WITNESS: I -- I don't -- I don't

05:34:30 2 recall -- yeah. I don't recall.

05:34:35 3 BY MR. SYLVESTER:

05:34:35 4 Q. Did you take a look at it when you
05:34:37 5 received the email?

05:34:41 6 A. If -- if this -- yes. If this was emailed
05:34:44 7 to the Ripple team, I would have received it and
05:34:46 8 read it.

05:34:46 9 Q. Yeah. I see on this email from 
05:34:49 10 you're one of the recipients.

05:34:51 11 A. Oh, yes.

05:34:52 12 Q. Do you see that?

05:34:52 13 A. Oh, yes. I'm sorry. Yes. You're talking
05:34:54 14 about this email thread. I get you. Yeah.

05:34:56 15 Q. Okay. Prior to this email thread, had you
05:35:00 16 seen this document?

05:35:04 17 A. I don't know.

05:35:09 18 Q. Before I started asking questions, you
05:35:11 19 took some time to read the document; is that right?

05:35:13 20 A. Yes.

05:35:15 21 Q. Whether or not you actually saw this
05:35:17 22 document prior to December 2017, were you generally
05:35:21 23 aware of its contents?

05:35:24 24 A. Prior to December 20th, 2017?

05:35:28 25 Q. Yes.

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05:35:31 1 A. I don't know.

05:35:37 2 Q. Prior to December 20th, 2017, did you

05:35:40 3 have an understanding that it was a problem to refer

05:35:46 4 to XRP as an investment?

05:35:48 5 A. I don't know.

05:35:49 6 Q. Okay. Returning the questions back in

05:35:54 7 this document, who drafted it?

05:35:57 8 A. The document, not the -- I believe

05:36:02 9 [REDACTED]

05:36:12 10 Q. The second page refers to "for

05:36:14 11 Confluence"?

05:36:15 12 A. Yes.

05:36:15 13 Q. In this context, what does "Confluence"

05:36:18 14 mean?

05:36:18 15 A. Confluence is a tool for an intranet, so a

05:36:26 16 website that only Ripple employees can access and

05:36:29 17 view.

05:36:31 18 Q. So is the text after the words "for

05:36:34 19 Confluence," colon, was that posted to Ripple's

05:36:38 20 intranet?

05:36:39 21 A. I don't recall.

05:36:47 22 Q. Do you know -- strike that.

05:36:50 23 Other than the recipients of this email,

05:36:53 24 to whom else did [REDACTED] distribute this document?

05:37:01 25 A. I'm not sure. The email -- it appears it

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05:37:09 1 went to the -- the Ripple team, to employees.

05:37:15 2 Q. All employees?

05:37:20 3 A. It appears that way from the document.

05:37:22 4 Q. Is that because the document says "Dear
05:37:25 5 Ripplers"?

05:37:27 6 A. Yes.

05:37:27 7 Q. I see.

05:37:31 8 Do you know whether it's still posted on
05:37:34 9 Confluence today?

05:37:35 10 A. I don't.

05:37:37 11 Q. Does the "Dear Ripplers" portion of the
05:37:39 12 document --

05:37:40 13 A. I'm sorry. I actually -- to --

05:37:41 14 Q. Go ahead.

05:37:42 15 A. I actually -- I don't know if it ever was
05:37:44 16 posted, so I also don't know if it still is.

05:37:46 17 Q. Fair enough.

05:37:51 18 The first page of the document, that one
05:37:52 19 that says:

05:37:53 20 "For email. Subject: How we

05:37:53 21 talk about XRP from your legal

05:37:53 22 department" --

05:37:53 23 (Reporter interruption.)

05:37:57 24 BY MR. SYLVESTER:

05:37:57 25 Q. The first page of the attachment says:

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05:37:59 1 "For email. Subject: How we

05:38:01 2 talk about XRP from your legal

05:38:03 3 department. Dear Ripplers."

05:38:05 4 Does that suggest to you that this -- this

05:38:08 5 page was emailed to Ripple employees?

05:38:10 6 A. It does.

05:38:11 7 Q. Okay. Do you recall receiving that email?

05:38:15 8 A. I don't.

05:38:17 9 Q. Were Ripple employees trained on the

05:38:19 10 contents of this document?

05:38:20 11 A. I'm -- I can't remember one way or the

05:38:33 12 other.

05:38:34 13 Q. Do you recall if you personally ever

05:38:35 14 received training on the contents of this document?

05:38:41 15 A. No, I don't. Well, I don't recall one way

05:38:43 16 or the other.

05:38:45 17 Q. Did any of the PR agency professionals who

05:38:49 18 worked with Ripple receive training on the contents

05:38:52 19 of this document?

05:38:54 20 A. I see that the document was emailed to

05:38:56 21 them with the note from me and from [REDACTED] so I

05:39:01 22 know -- I understand from this exhibit that they

05:39:05 23 received it, but I don't know beyond that if they

05:39:07 24 had training. I don't recall that. No.

05:39:13 25 Q. Has anyone made any changes or updates to

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05:39:15 1 this document that you're aware of?

05:39:17 2 A. Not that I'm aware of.

05:39:21 3 Q. Other than the email that we're looking

05:39:23 4 at, did Ripple ever provide this document to any

05:39:26 5 other third party?

05:39:27 6 A. Not that I know of.

05:39:43 7 Q. Do you know why this document was created?

05:39:51 8 A. So I don't recall it specifically, so I

05:39:55 9 can't speak to the intent at the time.

05:40:03 10 Q. You said you don't recall it specifically.

05:40:04 11 Do you have any general recollection of

05:40:05 12 why the document was created?

05:40:08 13 A. I think so, yes.

05:40:09 14 Q. What's that general recollection?

05:40:12 15 A. That -- so in December of 2017, there was

05:40:17 16 a large rally across crypto. So I believe the

05:40:26 17 intent was to reach out to Ripple employees to

05:40:30 18 ensure that they were -- in, you know, conversations

05:40:34 19 that they may have participated in, like on social

05:40:38 20 media, that they were being appropriate.

05:40:44 21 Q. When you say there was a rally in crypto,

05:40:46 22 does that mean -- how -- sorry. Strike that.

05:40:48 23 How did that rally in crypto affect XRP,

05:40:51 24 if at all?

05:40:53 25 A. XRP was a part of the rally. And it

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05:40:56 1 meant -- the results of that was that there was a
05:40:59 2 lot of attention. So lots of news outlets were
05:41:02 3 talking about crypto. There was just a lot of
05:41:07 4 attention on crypto and crypto companies.

05:41:11 5 Q. And were you aware, around this time, that
05:41:14 6 Ripple employees were having conversations in which
05:41:19 7 they were saying things that were impermissible
05:41:29 8 under the terms of this document?

05:41:35 9 MR. CERESNEY: Objection. Form.

05:41:35 10 THE WITNESS: Yeah. I don't -- I don't
05:41:37 11 read this as impermissible or rules, more so as
05:41:45 12 guidance. So at the time, I can't recall
05:41:51 13 specifically employees -- examples of employees, you
05:41:56 14 know, having, you know, inappropriate conversations
05:42:01 15 in social media, but I think the intent of this was
05:42:04 16 to try to get -- get ahead of that.

05:42:09 17 BY MR. SYLVESTER:

05:42:09 18 Q. Okay. And how did you come to the
05:42:10 19 understanding that the intent of this document was
05:42:12 20 to try to get ahead of that?

05:42:15 21 A. Reading it and just having a general
05:42:18 22 memory of that.

05:42:21 23 Q. Did you have any conversations with anyone
05:42:24 24 about the creation of this document?

05:42:29 25 A. I vaguely remember [REDACTED] creating it.

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05:42:35 1 MR. CERESNEY: Just to instruct you,

05:42:37 2 obviously the document is -- is -- we haven't any

05:42:42 3 privilege in the document by providing it to [REDACTED]

05:42:45 4 It's now been produced to the SEC.

05:42:47 5 But if you had discussions with counsel

05:42:50 6 about the creation of the document, those would

05:42:53 7 still be privileged discussions. So I just instruct

05:42:55 8 you not to reveal those discussions.

05:43:00 9 BY MR. SYLVESTER:

05:43:00 10 Q. Okay. Let's -- carving out [REDACTED] did

05:43:05 11 you have any conversations with anyone else at

05:43:06 12 Ripple about the creation of this document?

05:43:08 13 A. Not that I recall.

05:43:19 14 Q. Okay. Let's talk about a few aspects of

05:43:21 15 the document.

05:43:22 16 The last page of the for Confluence --

05:43:37 17 strike that.

05:43:38 18 The first page of this for Confluence

05:43:42 19 document, there's a few bolded paragraphs, one of

05:43:44 20 which says "Securities laws," another which says

05:43:47 21 "What are securities?"

05:43:48 22 Do you see that?

05:43:49 23 A. Yes.

05:43:49 24 Q. Fair to say that this document discusses

05:43:51 25 the securities laws?

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05:43:54 1 A. Yes.

05:43:56 2 Q. And fair to say that this document

05:43:58 3 discusses the possible application of the securities

05:44:00 4 laws to digital assets?

05:44:18 5 A. Yes. I can see a mention of "you can

05:44:22 6 imagine we weren't thinking about digital assets

05:44:24 7 when they were developed" referring to securities

05:44:27 8 laws.

05:44:27 9 Q. Okay. And on the last page of that

05:44:29 10 document, the paragraph under the bullets that

05:44:32 11 starts:

05:44:32 12 "Is that enough to squarely

05:44:34 13 say regulators won't treat XRP as a

05:44:36 14 security? Not quite."

05:44:40 15 A. I see that sentence or that -- yes, I see

05:44:42 16 that paragraph.

05:44:43 17 Q. Okay. Is that consistent with your

05:44:44 18 understanding with what Ripple's views were in

05:44:50 19 December 2017, that it wasn't known one way or the

05:44:52 20 other whether or not XRP would be considered a

05:44:54 21 security?

05:44:55 22 MR. CERESNEY: Objection to form.

05:45:08 23 THE WITNESS: What I recall is we did not

05:45:11 24 see XRP as a security for the bullet point -- for

05:45:14 25 the reasons listed in the bullet points. And beyond

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05:45:22 1 that, I -- you know, I wasn't involved in those
05:45:26 2 conversations with the legal team.

05:45:29 3 BY MR. SYLVESTER:

05:45:29 4 Q. Okay. Setting aside conversations with
05:45:30 5 the legal team, around this time, did you discuss
05:45:33 6 with anyone else at Ripple XRP status as a security?

05:45:40 7 A. Not to my recollection.

05:45:46 8 Q. Okay.

05:45:47 9 A. I'm sorry. Beyond --

05:45:48 10 Q. Go ahead.

05:45:49 11 A. We discussed earlier that, you know, I
05:45:50 12 would interact with Brad in preparation for -- but
05:45:52 13 that that was taking talking points and translating
05:45:56 14 them to press, not -- so that would be the only
05:45:59 15 nature that I can recall --

05:46:01 16 Q. Okay.

05:46:01 17 A. -- where I talked about this.

05:46:02 18 Q. Did that -- were those conversations as
05:46:04 19 early as 2017, with Brad? Mr. Garlinghouse.

05:46:10 20 A. No. I -- I recall the press inquiries
05:46:12 21 coming in 2018, around the time of that Coffey case
05:46:15 22 being filed, to my recollection.

05:46:22 23 Q. Did you see this document -- strike that.
05:46:26 24 The last sentence of that paragraph that
05:46:28 25 we were discussing says, in parentheses:

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05:46:32 1 "There are not bright lines

05:46:33 2 here, and how we talk about a

05:46:36 3 digital asset can make a

05:46:39 4 difference."

05:46:39 5 My question is was that of particular

05:46:42 6 concern to you, given your marketing role?

05:46:57 7 A. I recall that, you know, to the first

05:47:04 8 point in the team email around accuracy, that's kind

05:47:09 9 of where we were focused in terms of the messaging.

05:47:23 10 Q. Okay.

05:47:25 11 A. To -- yeah.

05:47:26 12 Q. Sure.

05:47:27 13 Be that as it may, were there -- did you

05:47:28 14 have concern that you would need to figure out what

05:47:33 15 it was Ripple might say about a digital asset that

05:47:37 16 might make a difference in whether or not XRP was

05:47:40 17 considered a security?

05:47:41 18 MR. CERESNEY: Objection. Form.

05:47:43 19 THE WITNESS: I -- I don't recall. Yeah.

05:47:49 20 In this time period, December 2017, I don't recall.

05:47:54 21 BY MR. SYLVESTER:

05:47:54 22 Q. Did you do anything to find out what

05:47:59 23 things Ripple might say or not say that might

05:48:04 24 influence whether or not it was -- XRP was

05:48:05 25 determined to be a security?

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05:48:17 1 A. The only thing I can think of is, you

05:48:20 2 know, discussing with our general counsel --

05:48:25 3 MR. CERESNEY: You have the --

05:48:27 4 THE WITNESS: Right. Right. I'll leave
05:48:28 5 it at that.

05:48:29 6 MR. CERESNEY: Leave it at that.

05:48:31 7 THE WITNESS: So it would be under
05:48:32 8 privilege.

05:48:32 9 MR. SYLVESTER: Okay.

05:48:32 10 THE WITNESS: I don't -- but I don't
05:48:32 11 recall. You know, at this time I don't recall.

05:48:36 12 BY MR. SYLVESTER:

05:48:36 13 Q. Okay. Setting aside the discussions with
05:48:37 14 your general counsel, did you have any other
05:48:40 15 conversations with others at Ripple, perhaps
05:48:41 16 including your team, about what things they should
05:48:44 17 say or not say that might lead into an analysis of
05:48:51 18 whether or not XRP was a security?

05:48:59 19 A. I don't know -- are you specifying
05:49:01 20 December 2017 with that question?

05:49:05 21 Q. Sure. Around that time.

05:49:08 22 A. I can't recall. I mean, my -- if this
05:49:10 23 email did, in fact, go to the entire Ripple team, my
05:49:13 24 team would have received it.

05:49:15 25 Q. Okay. And what about the cheat sheet

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05:49:17 1 portion of the document, where it says:

05:49:18 2 "A cheat sheet on how to talk
05:49:20 3 about XRP"?

05:49:22 4 Was that something that was important to
05:49:23 5 convey to your team?

05:49:28 6 A. You know, my team, as part of the broader
05:49:31 7 Ripple team, would have received this, yes.

05:49:35 8 Q. But you personally didn't see to it that
05:49:38 9 it was conveyed to them?

05:49:42 10 A. I can't recall -- I can't recall specific
05:49:44 11 discussions I would have had with my team related to
05:49:47 12 this table.

05:49:49 13 Q. Okay. In your time at Ripple, did you
05:49:57 14 ever hear anyone at Ripple refer to "Ripple's XRP"?

05:50:05 15 A. Anyone within the company?

05:50:07 16 Q. Yes.

05:50:08 17 A. I couldn't say one way or the other.

05:50:12 18 Q. Because you don't recall?

05:50:13 19 A. I don't -- yes, I don't recall.

05:50:16 20 Q. How about did you hear anyone at Ripple
05:50:18 21 say, "We are working hard to increase the price of
05:50:21 22 XRP"?

05:50:22 23 A. I don't recall.

05:50:24 24 Q. Did -- did you ever hear anyone at Ripple
05:50:26 25 say, "XRP is a strong long-term investment"?

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05:50:29 1 A. I don't recall.

05:50:30 2 Q. How about "trading in Ripple"?

05:50:32 3 A. I don't recall.

05:50:33 4 Q. How about "We're up X percent today"?

05:50:35 5 A. I don't recall.

05:50:36 6 Q. Okay. Is it your understanding that the

05:50:38 7 statements that I just listed, if they were said by

05:50:40 8 someone at Ripple, would be, you know, outside the

05:50:43 9 bounds of the guidelines of this document?

05:50:47 10 MR. CERESNEY: Objection. Form.

05:50:50 11 THE WITNESS: What I see in the document

05:50:52 12 is [REDACTED] you know, starts by saying "we like

05:50:57 13 accuracy," second paragraph about regulatory

05:51:02 14 treatment and, you know, educating the market around

05:51:08 15 that.

05:51:12 16 So the way I take the table is even

05:51:15 17 though, you know, these might not be things

05:51:17 18 Ripple -- Ripple employees specifically said, it's

05:51:20 19 to educate our own team that, you know, as a Ripple

05:51:26 20 employee, it's -- it's not appropriate to be on

05:51:31 21 social media or other places commenting about price

05:51:35 22 or investments because that's not representative of

05:51:41 23 the company's view, it's not what we're focused on

05:51:45 24 as a company.

05:51:46 25 We're focused on the right-hand column --

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05:51:48 1 or, sorry, I will be more specific. We're focused
05:51:51 2 on the utility -- building utility behind XRP.

05:52:00 3 BY MR. SYLVESTER:

05:52:00 4 Q. Okay. It seems like -- so the -- for the
05:52:03 5 record, the chart says -- the left-hand column says
05:52:05 6 "Instead of this," and the right hand column says
05:52:09 7 "Say this."

05:52:10 8 So that seems to suggest to me that for
05:52:12 9 each of these entries, there is one problematic
05:52:15 10 statement, and the chart recommends, instead, the
05:52:18 11 person say another statement that's within the
05:52:22 12 guidelines of this document.

05:52:23 13 Is that fair?

05:52:24 14 MR. CERESNEY: Objection. Form.

05:52:26 15 THE WITNESS: Well, I see the lead-in
05:52:27 16 says:

05:52:27 17 "To better illustrate the
05:52:30 18 distinction."

05:52:31 19 So I take the table as illustrative, not
05:52:34 20 prescriptive. So the point being if someone wanted
05:52:41 21 to say "we are working hard to increase the price of
05:52:43 22 XRP," that's not the case. Something we are doing
05:52:46 23 is working hard to create compelling uses for XRP, a
05:52:52 24 unique digital asset.

25 / /

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05:53:01 1 BY MR. SYLVESTER:

05:53:01 2 Q. Okay. Going back to the sentence we
05:53:03 3 talked about earlier:

05:53:03 4 "There are not bright lines
05:53:05 5 here, and how we talk about a
05:53:07 6 digital asset can make a
05:53:09 7 difference."

05:53:10 8 Is it fair to say that Ripple understood,
05:53:11 9 at the time of this document, that how Ripple talked
05:53:13 10 about a digital asset can make a difference?

05:53:18 11 MR. CERESNEY: Objection. Form.

05:53:23 12 He's asked you whether Ripple understood
05:53:24 13 that.

05:53:25 14 THE WITNESS: I mean, yeah, I -- I can
05:53:27 15 say -- I mean, this was authored by [REDACTED] -- sorry,
05:53:30 16 [REDACTED] our general counsel, so that's definitely
05:53:34 17 her view -- or that appears to be her view, I should
05:53:39 18 say.

05:53:40 19 I can't say that across the whole company,
05:53:43 20 that was -- that was a shared belief or
05:53:48 21 understanding. I can't remember.

05:53:50 22 BY MR. SYLVESTER:

05:53:50 23 Q. Prior to this document, had Ripple issued
05:53:52 24 any guidance about what to say or not say about XRP
05:53:57 25 before?

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1

2 05:53:59 1 A. Not that I recall.

3 05:54:09 2 Q. Do you know what the DAO report is?

4 05:54:15 3 MR. CERESNEY: D-A-O.

5 05:54:16 4 THE WITNESS: Oh, no.

6 05:54:17 5 MR. SYLVESTER: Okay. Let's take a look

7 05:54:26 6 at Number 83, please.

8 05:54:28 7 (Whereupon, Deposition Exhibit 83

9 05:54:28 8 was marked for identification.)

10 05:54:37 9 BY MR. SYLVESTER:

11 05:54:43 10 Q. Exhibit 83 is an email from you to

12 05:54:45 11 Mr. Garlinghouse, cc'ing a few folks, [REDACTED]

13 05:54:51 12 [REDACTED] [REDACTED] The date is April 4th,

14 05:54:55 13 2018. The re line is:

15 05:54:56 14 "Interview for a story."

16 05:55:04 15 I have a question on your email, so let me

17 05:55:06 16 know when you're ready.

18 05:55:07 17 A. Okay.

19 05:55:08 18 Okay.

20 05:58:51 19 Q. All right. So your email says:

21 05:58:57 20 "In parallel, is there a

22 05:58:58 21 credible voice we can activate to

23 05:59:00 22 take the position that XRP is more

24 05:59:03 23 commodity than security?

25 05:59:04 24 [REDACTED] ? [REDACTED] "

26 05:59:07 25 Who is Ben Loski?

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05:59:11 1 A. [REDACTED] was the New York DFS -- I can't

05:59:19 2 remember his exact title. Sorry. Director?

05:59:25 3 MR. CERESNEY: I'm just smiling because I

05:59:26 4 think [REDACTED] would take offense.

05:59:30 5 THE WITNESS: I'm sorry. I'm sorry.

05:59:31 6 MR. CERESNEY: -- title, but we can --

05:59:32 7 THE WITNESS: I'm sorry. It's a really

05:59:34 8 long title. Superintendent --

05:59:36 9 MR. CERESNEY: I'm going to send him this

05:59:37 10 transcript page.

05:59:38 11 THE WITNESS: Oh, great. I'm gonna get

05:59:40 12 a -- so I believe at the time he had held that

05:59:45 13 position, he was a Ripple board member for a time as

05:59:48 14 well.

05:59:49 15 BY MR. SYLVESTER:

05:59:49 16 Q. I see.

05:59:50 17 And why is it that he was a credible voice

05:59:53 18 that you suggested that Ripple activate to take the

05:59:57 19 position that XRP is more commodity than security?

06:00:04 20 A. I -- I don't -- I don't specifically

06:00:08 21 recall. [REDACTED] had a regulatory background, dealt with

06:00:16 22 cryptocurrencies.

06:00:17 23 Q. And who is [REDACTED]

06:00:20 24 A. He was the former -- he was the former

06:00:26 25 head of the [REDACTED] I believe.

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06:00:30 1 Q. And same question as to him.

06:00:31 2 Why is it that you wanted him to comment

06:00:33 3 that XRP is more commodity than security?

06:00:36 4 A. Similar. He had a regulatory background.

06:00:42 5 Q. And --

06:00:45 6 A. Or, yes, industry background.

06:00:47 7 Q. And what would comments from either of

06:00:49 8 these luminaries achieve for Ripple?

06:00:59 9 A. Following the thread, I believe to provide

06:01:06 10 a point of view on how XRP could be considered a

06:01:10 11 classified.

06:01:14 12 Q. Specifically that it was more commodity

06:01:16 13 than security?

06:01:18 14 A. I see that in my email, yes.

06:01:22 15 Q. You mentioned earlier that on occasion,

06:01:25 16 when you got press inquiries about the topic of

06:01:30 17 whether or not XRP was a security, that on occasion,

06:01:33 18 you directed them to the FinCEN settlement, and

06:01:37 19 particularly the statement that XRP was a currency;

06:01:40 20 is that right?

06:01:41 21 A. Yes, I remember that.

06:01:42 22 Q. Okay. Why was it, with respect to this

06:01:47 23 idea about activating a credible voice, that you

06:01:51 24 wanted them to take the position that XRP was a

06:01:55 25 commodity and not a currency?

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06:01:57 1 A. I don't know.

06:01:59 2 Q. Was it your idea that these two should

06:02:02 3 take the position that XRP is more commodity than

06:02:05 4 security?

06:02:08 5 A. I don't -- I don't think so, no.

06:02:10 6 Q. Whose idea was it?

06:02:13 7 A. I -- I can't recall.

06:02:20 8 Q. Was it Mr. Garlinghouse's?

06:02:22 9 A. I can't recall.

06:02:27 10 Q. Is it unusual that -- that you would have

06:02:29 11 a suggestion on who to recruit to take a third-party

06:02:33 12 position on a Ripple topic and not know why they

06:02:37 13 were selected?

06:02:38 14 MR. CERESNEY: Objection. I think she's

06:02:39 15 saying she can't recall. She's not saying that at

06:02:43 16 the time she didn't know.

06:02:44 17 THE WITNESS: That's -- yeah. That's

06:02:45 18 true. I just can't recall this -- this instance.

06:02:50 19 BY MR. SYLVESTER:

06:02:50 20 Q. Sitting here today, do you believe that

06:02:52 21 XRP is more commodity than security?

06:03:01 22 A. I -- I am not a legal expert. I -- so I

06:03:07 23 don't -- I don't have a view to offer there.

06:03:13 24 Q. So in April of '18, what would be the

06:03:16 25 purpose of these two offering their views that XRP

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06:03:19 1 is more commodity than security?

06:03:23 2 MR. CERESNEY: Objection. Form.

06:03:28 3 THE WITNESS: I don't recall. So I don't

06:03:32 4 remember this time and this instance or what I was

06:03:36 5 thinking of or whether, you know, others had weighed

06:03:44 6 in here. I just don't recall it.

06:03:46 7 BY MR. SYLVESTER:

06:03:46 8 Q. Who would typically weigh in on decisions

06:03:49 9 about which third parties would be activated to

06:03:52 10 comment on Ripple issues?

06:03:59 11 MR. CERESNEY: Objection to form.

06:04:00 12 You can answer.

06:04:03 13 THE WITNESS: Well, generally or

06:04:04 14 specifically here?

06:04:06 15 BY MR. SYLVESTER:

06:04:06 16 Q. Generally.

06:04:09 17 A. Generally. Generally, it depended on the

06:04:12 18 instance.

06:04:14 19 Q. On the -- on sort of regulatory topics

06:04:16 20 regarding XRP, who would generally weigh in on what

06:04:20 21 third parties would be appropriate to comment on

06:04:22 22 that topic?

06:04:25 23 A. Likely our legal team.

06:04:30 24 MR. SYLVESTER: Okay. Let's move on to

06:04:31 25 85, please.

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06:04:34 1 (Whereupon, Deposition Exhibit 85
06:04:35 2 was marked for identification.)

06:04:36 3 BY MR. SYLVESTER:

06:04:49 4 Q. And Exhibit 85 is an email from
06:04:52 5 [REDACTED] at Ripple to Mr. Garlinghouse and
06:04:56 6 you. This appears to be discussing articles about
06:05:13 7 [REDACTED] departure; is that right?

06:05:15 8 A. Yes.

06:05:16 9 Q. Okay. [REDACTED] says:

06:05:19 10 "FYI on the [REDACTED] piece on
06:05:21 11 [REDACTED] Straightforward and I'm
06:05:24 12 pleased to see that Mary Jo is
06:05:25 13 making it into all of these
06:05:27 14 pieces."

06:05:28 15 Who is Mary Jo?

06:05:32 16 MR. CERESNEY: You can answer the
06:05:34 17 question.

06:05:34 18 THE WITNESS: I believe she's referring to
06:05:36 19 Mary Jo White.

06:05:37 20 BY MR. SYLVESTER:

06:05:37 21 Q. Do you have an understanding of why
06:05:39 22 [REDACTED] was pleased to see that Chair White was
06:05:43 23 referenced in all of these news pieces?

06:05:46 24 A. I'm just reviewing the thread to try to
06:05:48 25 refresh my memory.

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1

2 06:06:16 1 I am not -- I'm not sure why she said

3 06:06:20 2 that.

4 06:06:24 3 Q. Did you ask her?

5 06:06:25 4 A. Not that I recall.

6 06:06:28 5 Q. Okay. Let's go back to Exhibit 80.

7 06:06:31 6 Still have that?

8 06:06:32 7 A. Sure.

9 06:06:32 8 Q. Okay. We're going to go to Bates ending

10 06:06:41 9 781520. Maybe it's --

11 06:07:00 10 A. 76 --

12 06:07:01 11 Q. 761520.

13 06:07:03 12 A. -- 15 -- okay.

14 06:07:11 13 Q. And this, I'll represent to you, is a

15 06:07:14 14 message exchange with [REDACTED] June 14,

16 06:07:19 15 2018?

17 06:07:20 16 A. Mh-hmm.

18 06:07:22 17 Q. And I don't know who is who or if this

19 06:07:25 18 is -- I think this is [REDACTED] to you. Just take

20 06:07:28 19 a look at it and see if you agree with that

21 06:07:31 20 interpretation.

22 06:07:31 21 A. Okay.

23 06:07:51 22 Q. Do you have a recollection of whether

24 06:07:53 23 that's [REDACTED] message to you?

25 06:07:55 24 A. It -- it appears so.

26 06:07:58 25 Q. Okay. "[REDACTED] more aggressive version," is

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06:08:01 1 that a reference to [REDACTED]

06:08:03 2 A. Yes.

06:08:03 3 Q. And this appears to be something

06:08:05 4 [REDACTED] drafted; is that right?

06:08:07 5 A. Yes.

06:08:07 6 Q. It says "We believe" -- among other

06:08:09 7 things, it says:

06:08:10 8 "We believe that XRP likewise

06:08:11 9 should not be classified as a

06:08:13 10 security and look forward to

06:08:14 11 confirmation from the SEC."

06:08:20 12 It appears, from my review of this, that

06:08:22 13 that was drafted for use by Mr. Garlinghouse.

06:08:25 14 Is that correct?

06:08:31 15 A. I don't know. It could have been a

06:08:32 16 company spokesperson.

06:08:35 17 Q. The sentence I just read could have been

06:08:37 18 drafted for a different company spokesperson?

06:08:40 19 A. Right. Or -- or generically, the company,

06:08:42 20 you know, Ripple spokesperson.

06:08:45 21 Q. Does that sentence accurately reflect

06:08:47 22 Ripple's views as of June 2018.

06:08:57 23 A. I can't -- I can't recall. I can't

06:09:05 24 recall, and I don't know if we published this.

06:09:22 25 MR. SYLVESTER: All right. Let's look at

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06:09:23 1 Exhibit 73.

06:09:24 2 (Whereupon, Deposition Exhibit 73

06:09:25 3 was marked for identification.)

06:09:25 4 BY MR. SYLVESTER:

06:09:37 5 Q. 73 is an email from you to [REDACTED]

06:09:45 6 I apologize. I don't know how to pronounce that.

06:09:47 7 A. That's okay. [REDACTED]

06:09:48 8 Q. [REDACTED] Great.

06:09:49 9 cc to [REDACTED] Subject: "Re

06:09:51 10 Chatter from XRP movements." And it contains a

06:09:55 11 thread from Mr. Garlinghouse.

06:10:46 12 MR. CERESNEY: I think it's under 10. How

06:10:53 13 much time is left? Yeah.

06:11:10 14 THE WITNESS: Okay.

06:11:11 15 BY MR. SYLVESTER:

06:11:11 16 Q. Okay. Great.

06:11:12 17 So Mr. Garlinghouse writes an email to

06:11:17 18 you, among others, on the bottom chain. He says

06:11:21 19 "See screen shot," which you can't see in this

06:11:25 20 document.

06:11:26 21 But he references in this paragraph:

06:11:30 22 "But a lot of XRP has been

06:11:31 23 moving around lately."

06:11:33 24 And then his last sentence says:

06:11:35 25 "My impression is that this is

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06:11:36 1 another example of us being overly
06:11:39 2 silent when there are likely
06:11:41 3 opportunities to be proactively
06:11:43 4 comment and be constructive to the
06:11:45 5 BS/FUD."

06:11:47 6 Do you have an understanding of what

06:11:49 7 Mr. Garlinghouse meant by "us being overly silent"?

06:12:00 8 A. I don't -- I don't know what he meant.

06:12:02 9 Q. Did you ask him?

06:12:07 10 A. I'm not sure. I can't remember.

06:12:09 11 Q. Okay. On your top email, you write

06:12:11 12 [REDACTED] and say:

06:12:13 13 "I'll also schedule an update

06:12:15 14 for Brad to show him all we're

06:12:17 15 doing for XRP stewardship. He's

06:12:19 16 incorrect that we're 'silent.'"

06:12:23 17 Do you recall having that meeting with

06:12:24 18 Mr. Garlinghouse?

06:12:24 19 A. I don't.

06:12:25 20 Q. When you write that you would show

06:12:27 21 Mr. Garlinghouse all we're doing for XRP

06:12:29 22 stewardship, to what does that refer?

06:12:36 23 A. At the time, it referred to messaging that

06:12:42 24 we would convey and put out into the market around

06:12:47 25 XRP's attributes as being very efficient for

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06:12:50 1 settlement, very scalable, energy efficient, and the
06:12:57 2 use cases around it, obviously, payments being one
06:13:02 3 of them, but others coming from other developers.

06:13:07 4 So it was -- yeah, in the interest of
06:13:09 5 getting that messaging out there and talking about
06:13:11 6 those use cases.

06:13:12 7 Q. And is that what you're referencing when
06:13:15 8 you're saying "He's incorrect that we're 'silent'"?

06:13:20 9 A. Potentially. I'm not sure.

06:13:23 10 Q. Was Mr. Garlinghouse generally
06:13:25 11 enthusiastic about your efforts to combat FUD?

06:13:31 12 MR. CERESNEY: Objection. Form.

06:13:37 13 THE WITNESS: I couldn't -- I couldn't say
06:13:39 14 or -- yeah, I don't -- I don't know if he was
06:13:41 15 enthusiastic.

06:13:44 16 BY MR. SYLVESTER:

06:13:44 17 Q. Did -- did he raise inquiries like this
06:13:50 18 where he pointed out there are likely opportunities
06:13:53 19 to proactively comment and combat FUD on other
06:13:57 20 occasions?

06:13:57 21 A. Yes, he did.

06:13:59 22 Q. Is that relatively frequent in your time
06:14:01 23 reporting to him?

06:14:03 24 MR. CERESNEY: Objection. Form.

06:14:07 25 THE WITNESS: Over the time of reporting

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06:14:07 1 to him, no.

06:14:12 2 BY MR. SYLVESTER:

06:14:12 3 Q. We looked at a document earlier where

06:14:16 4 [REDACTED] expressed positive views that a

06:14:20 5 reference to Chair White had made it into the press.

06:14:23 6 Do you recall that?

06:14:24 7 A. Yes.

06:14:26 8 Q. Okay. Was there a plan at Ripple to

06:14:29 9 market Chair White's representation of Ripple in the

06:14:35 10 press?

06:14:35 11 MR. CERESNEY: Objection. You know,

06:14:36 12 you're going into an area here that I think is

06:14:39 13 completely inappropriate. I gave you some leeway

06:14:41 14 initially on this, but I think, you know, going into

06:14:45 15 defense counsel and the use of defense counsel in

06:14:47 16 the public record is -- I don't understand what the

06:14:50 17 relevance is. I have no idea why that's something

06:14:52 18 that's even a question in a deposition. So I'm

06:14:55 19 going to object on that front.

06:14:58 20 MR. SYLVESTER: It's not privileged,

06:14:59 21 though, is it? Are you instructing her not to

06:15:02 22 answer?

06:15:02 23 MR. CERESNEY: I'm objecting on the fact

06:15:03 24 that you're going down a road that I have no -- can

06:15:04 25 you give me a proffer as to why this is relevant in

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06:15:07 1 any sense?

06:15:07 2 MR. SYLVESTER: Well, yeah, sure. It's a
06:15:09 3 couple documents, not all that we've gotten to, are
06:15:12 4 marketing Chair White's retention as a former chair
06:15:15 5 of the SEC in a time period when Ripple was trying
06:15:18 6 to convey to the market and convince, we would say,
06:15:20 7 market actors that XRP was not a security, and that
06:15:24 8 was part of that campaign. And I'm asking her
06:15:26 9 whether or not that's the case.

06:15:28 10 MR. CERESNEY: But I don't understand why
06:15:29 11 that period of time is relevant to anything in this
06:15:31 12 case in terms of -- I mean, I read the judge's
06:15:34 13 order, frankly, the other day to say that what
06:15:37 14 Ripple is doing in terms of the market is not really
06:15:39 15 relevant to its fair notice defense.

06:15:43 16 MR. TENREIRO: It's Howey point. It's a
06:15:44 17 Howey point. Your statements -- a Howey point.
06:15:46 18 Your statements to the market in Howey, you look at
06:15:48 19 the statements that the market makes. So all the
06:15:51 20 statements you make to the public are relevant.

06:15:55 21 MR. CERESNEY: No. The market
06:15:56 22 participants' view are what's relevant, not what
06:15:59 23 Ripple is saying to the market.

06:16:01 24 MR. TENREIRO: No. Well, why -- I
06:16:01 25 can't -- I can't know what the market participants'

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06:16:04 1 views are without knowing what you say. It's the

06:16:06 2 character of the instruments given in commerce.

06:16:08 3 You're making statements. Your statements are what

06:16:10 4 the focus of what Howey is.

06:16:13 5 MR. CERESNEY: I -- why is the statements

06:16:15 6 about the defense of an investigation or of a claim

06:16:19 7 that XRP is a security, why is that relevant in any

06:16:22 8 sense to the Howey analysis? It has nothing to do

06:16:26 9 with the Howey analysis.

06:16:28 10 MR. TENREIRO: It has everything --

06:16:29 11 MR. CERESNEY: Whether it's a security?

06:16:31 12 MR. TENREIRO: It's has everything to do.

06:16:31 13 It's the expectations you're creating in people.

06:16:33 14 MR. CERESNEY: Why would having Chair

06:16:34 15 White as counsel in this case create any

06:16:36 16 expectations with regard to the price of XRP?

06:16:40 17 MR. TENREIRO: I just don't know what they

06:16:41 18 were saying to people. It's -- you know, it's a

06:16:42 19 very broad relevance standard. It's a deposition.

06:16:44 20 I don't know what they were saying. It depends on

06:16:45 21 what they were saying. It may be that it just ends

06:16:49 22 up having no relevance as a Howey analysis, but it's

06:16:52 23 a Howey point.

06:16:53 24 MR. CERESNEY: What's the question that's

06:16:55 25 pending? I've lost it now. Thank you.

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06:16:55 1 THE REPORTER: Do you want me to read it?

06:17:04 2 MR. CERESNEY: Yes, please.

06:17:04 3 (Record read by the reporter
06:17:04 4 as follows:

06:17:11 5 QUESTION: Okay. Was there a
06:17:11 6 plan at Ripple to market Chair
06:17:11 7 White's representation of Ripple
06:17:11 8 in the press?)

06:17:12 9 MR. CERESNEY: Do you -- can you answer
06:17:13 10 that question "yes" or "no" or you don't recall?

06:17:20 11 THE WITNESS: I don't recall.

06:17:21 12 MR. CERESNEY: Okay. Next question. Or
06:17:26 13 are we done? You have four minutes.

06:17:29 14 MR. SYLVESTER: I think we're done.
06:17:30 15 Do you have any questions?

06:17:32 16 MR. CERESNEY: Let us take -- just two
06:17:34 17 things. One, I want to designate the transcript of
06:17:38 18 this deposition as confidential. That's the first
06:17:40 19 thing.

06:17:41 20 Second thing, let us just take a quick
06:17:44 21 two-, three-minute break, and then we'll come back.

06:17:48 22 MR. SYLVESTER: Off the record, please.

06:17:49 23 THE VIDEOGRAPHER: This marks the ending
06:17:50 24 of Media Number 9. Our time now is 6:17 p.m., and
06:17:54 25 we're going off record.

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06:19:50 1 (Whereupon, a recess was taken.)

06:21:06 2 THE VIDEOGRAPHER: This marks the

06:21:07 3 beginning of Media Number 10. Our time now is

06:21:10 4 6:21 p.m., and we're on record.

06:21:13 5 MR. SYLVESTER: Okay. Counsel for Ripple,

06:21:14 6 do you have any questions of the witness?

06:21:16 7 MR. CERESNEY: I do not.

06:21:17 8 MR. SYLVESTER: Counsel for

06:21:18 9 Mr. Garlinghouse?

06:21:20 10 MR. SOLOMON: I do not have questions.

06:21:20 11 Thanks.

06:21:21 12 MR. SYLVESTER: Counsel for Mr. Larsen?

06:21:23 13 MS. DEARBORN: No questions for this

06:21:24 14 witness.

06:21:25 15 Thank you much for your time.

06:21:26 16 MR. SYLVESTER: Thank you. Then we're

06:21:26 17 done.

06:21:27 18 Thank you, Ms. Long, for your time.

06:21:28 19 THE WITNESS: Thank you.

06:21:28 20 THE VIDEOGRAPHER: This marks the ending

06:21:29 21 of Media Number 10, and this concludes today's

06:21:32 22 deposition of Monica Long. Our time now is

06:21:34 23 6:21 p.m., and we're going off the record.

24 (Deposition concluded at 6:21 p.m.)

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CERTIFICATE OF WITNESS

I, MONICA LONG, do hereby declare under
penalty of perjury that I have read the entire
foregoing transcript of my deposition testimony,
or the same has been read to me, and certify that
it is a true, correct and complete transcript of
my testimony given on June 17, 2021, save and
except for changes and/or corrections, if any, as
indicated by me on the attached Errata Sheet, with
the understanding that I offer these changes and/or
corrections as if still under oath.

_____ I have made corrections to my deposition.

_____ I have NOT made any changes to my deposition.

Signed: _____

MONICA LONG

Dated this _____ day of _____ of 20____.

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CERTIFICATE OF REPORTER

I, Kathleen A. Wilkins, Certified
 Shorthand Reporter licensed in the State of
 California, License No. 10068, hereby certify that
 deponent was by me first duly sworn, and the
 foregoing testimony was reported by me and was
 thereafter transcribed with computer-aided
 transcription; that the foregoing is a full,
 complete, and true record of proceedings.

I further certify that I am not of counsel
 or attorney for either or any of the parties in the
 foregoing proceeding and caption named or in any way
 interested in the outcome of the cause in said
 caption.

The dismantling, unsealing, or unbinding
 of the original transcript will render the
 reporter's certificates null and void.

In witness whereof, I have hereunto set my
 hand this day:

_____ Reading and Signing was requested.

_____ Reading and Signing was waived.

 X Reading and Signing was not requested.

KATHLEEN A. WILKINS

CSR 10068, RPR-RMR-CRR-CCRR-CLR-CRC

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ERRATA SHEET

Deposition of: MONICA LONG

Date taken: JUNE 17, 2021

Case: SEC v. RIPPLE LABS, INC., et al.

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